

EXHIBIT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PDV USA, INC.,

Plaintiff,

v.

CONSULTING AGREEMENT AT ISSUE IN
THIS CASE. CONSULTING, INC.,

Defendant.

Case No. 20-cv-03699 (JGK)

DEFENDANT'S PRIVILEGE LOG

Defendant, CONSULTING AGREEMENT AT ISSUE IN THIS CASE. CONSULTING, INC., by and through its undersigned counsel, under Local Civil Rule 26.2, hereby submits the following log to Plaintiff, PDV USA, Inc., in conjunction with its Responses to Requests for Production.

Type of Document	Participants in Conversation (Including David Rivera)	Subject-Matter	Privilege	Date/Time
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	12/07/2021 19:52:44
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	10/28/2021 09:31:51
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	10/28/2021 09:31:17
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	10/28/2021 09:25:25
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	10/27/2021 13:16:57

WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	10/21/2021 09:12:49
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	10/20/2021 09:08:16
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	10/18/2021 12:44:48
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	10/18/2021 11:15:26
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	10/17/2021 09:51:36
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	04/30/2021 17:26:06
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	04/30/2021 16:44:45
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case/Attorney/Client Communication	Non-Responsive/Attorney-Client Privilege	08/23/2021 16:31:19
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	02/07/2019 09:43:23
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	02/07/2019 09:05:43
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	02/07/2019 09:02:46
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	02/07/2019 13:26:24
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	02/07/2019 09:43:05
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	02/07/2019 09:07:31
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	02/07/2019 09:07:31

WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	05/19/2020 09:29:49
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	01/29/2021 10:17:41
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	01/21/2021 21:59:41
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	01/16/2021 12:50:42
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	01/16/2021 08:18:28
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	01/15/2021 22:54:49
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	01/14/2021 21:21:50
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	10/08/2020 12:11:59
WhatsApp Message	Unknown	Attorney/Client Communication	Attorney-Client Privilege	09/27/2020 10:41:03
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	05/20/2020 07:03:34
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	05/18/2020 14:32:58
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	08/03/2019 11:18:05
WhatsApp Message	Unknown	Attorney/Client Communication	Attorney-Client Privilege	07/17/2019 16:01:39
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	06/27/2019 18:05:47
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WhatsApp Message	Unknown	Attorney/Client Communication	Attorney-Client Privilege	02/25/2019 18:28:58
WhatsApp Message	Unknown	Attorney/Client Communication	Attorney-Client Privilege	02/25/2019 15:05:50
WhatsApp Message	Unknown	Attorney/Client Communication	Attorney-Client Privilege	02/25/2019 14:55:35
WhatsApp Message	Unknown	Attorney/Client Communication	Attorney-Client Privilege	02/25/2019 14:54:02
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	02/13/2019 19:01:28

WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	02/13/2019 14:35:55
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	02/12/2019 10:29:51
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	02/11/2019 10:23:13
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	02/09/2019 10:43:39
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	02/08/2019 09:21:49
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case/Attorney/Client Communication	Non-Responsive	02/07/2019 09:47:38
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	02/06/2019 23:43:23
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	02/06/2019 23:04:13
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	01/31/2019 21:45:22
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	1/31/2019 21:43
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	01/31/2019 20:23:01
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	01/31/2019 20:22:07
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	01/31/2019 17:46:13
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	01/29/2019 20:26:30
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WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	08/31/2018 13:04:26
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	5/24/2017 10:36
WhatsApp Message	Counsel	Attorney/Client Communication privilege	Attorney-Client Privilege	05/04/2017 17:51:25
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WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	08/26/2021 14:01:19
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WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	04/29/2021 18:59:02
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	02/06/2021 12:05:32
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	01/28/2021 12:27:43
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	01/28/2021 12:26:36
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	01/15/2021 22:54:49
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WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	07/13/2020 13:19:23
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	05/22/2020 17:14:31
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	05/20/2020 07:03:34
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	07/18/2019 17:46:23
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	07/18/2019 17:08:06
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	07/18/2019 17:07:41
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	07/18/2019 17:06:40
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WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	07/18/2019 16:23:05
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	07/17/2019 16:01:39
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	07/17/2019 15:41:42
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	06/16/2019 08:59:40
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	06/13/2019 13:43:13
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	02/13/2019 19:01:28

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WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	03/13/2018 21:45:46
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WhatsApp Message	Raul Gorrin	Attorney/Client Communication	Attorney-Client Privilege	10/06/2017 11:56:53
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	10/03/2017 13:52:31

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WhatsApp Message	Raul Gorrin	Attorney/Client Communication	Attorney-Client Privilege	5/24/2017 10:36
WhatsApp Message	Counsel	Attorney/Client Communication	Attorney-Client Privilege	04/23/2017 21:52:22
WhatsApp Message	Raul Gorrin	Attorney/Client Communication	Attorney-Client Privilege	04/23/2017 15:54:23
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WhatsApp Message	Raul Gorrin	Attorney/Client Communication	Attorney-Client Privilege	11/10/2017 08:08:35
WhatsApp Message	Raul Gorrin	Attorney/Client Communication	Attorney-Client Privilege	11/09/2017 20:37:59
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WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	10/26/2021 15:45:05
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	10/21/2021 09:12:49
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	10/20/2021 09:08:16

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WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	12/28/2019 21:47:02
WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	04/07/2018 12:54:51
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WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	10/26/2021 17:11:37
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WhatsApp Message	Unknown	political discussion unrelated to Consulting Agreement at issue in this case.	Non-Responsive	02/07/2019 09:37:45
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Counsel		Attorney-Client		04/06/2017 15:39:54

Dated: March 3, 2022.

s/ Jason Johnson

Tucker H. Byrd

Florida Bar No. 381632

Min Cho

Florida Bar No. 754331

Jason Johnson

Florida Bar No. 186538

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 3, 2022, a copy of the foregoing has been furnished via electronic mail to all counsel of record as follows:

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